

FILED

CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
BY [Signature]

2009 NOV -6 AM 9:35

1 Mr. Sexual Sin de UN Abdul Blue  
2 823 N. Hudson Ave, #01  
Hollywood California 90038

3 323 871 4169

4 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

5 Mr. Sexual Sin De Un Abdul Blue

) Case No.:

)

) COMPLAINT

CV09-07573 PA (jem)

) Neglect  
>) Defamation  
) Civil Conspiracy  
) Civil Rights Violation  
) Personal Injury  
Severe Emotional Distress  
State and Federal Constitution Violation  
Due rights process Violation  
Violation of the eight amendment to the  
united states constitution  
Violation of the fourth amendment to the  
united States Constitution

6 Plaintiff,

7 vs.

8 City of Los Angeles,

9 Los Angeles Police Department

10 William J. Bratton,

11 Officer Craig, Officer Kohr,

12 Officer Mendoez, Officer Brower,

13 Officer Vinton, John Doe, John Doe,

14 John Doe, John Doe, John Doe,

15 Sued In their official and Individual

16 Capacities,

17 Defendant's

18 JURY TRIAL DEMANDED

19 This is a civil rights action filed by the plaintiff Mr. SEXUAL BLUE, and State of  
California parole for damages and injunctive relief under 42 USC 1983, ALLEGING DENIAL  
20 OF THE DUE PROCESS CLAUSE TO THE UNITED STATES CONSTITUTION ADMENDMENTS, AND  
21 NEGLIGENCE.

22 23

23 Jurisdiction

24 The court has jurisdiction over the plaintiff claims of Violation of the  
federal Constitutional rights under 42 USC 1983

25 The court has supplemental jurisdiction over the plaintiff State law tort  
claims under 28 USC 1337

26 2009 OCT 19 AM 10:30  
27 CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
28 BY [Signature]

## PARTIES

3. The plaintiff, Sexual sin de un Abdul Blue, was on parole in the City of Hollywood, State of California during the events described in this complaint.
4. The defendant's officer Craig, Officer Kirkman, Officer Kohr, Officer Vinton, Officer Mendoza, Officer Brower, are police officers for the City of Los Angeles. They are sued in their official and individual capacities.
5. Defendants John does are police officers for the City of Los Angeles. The above defendants last and true names are presently unknown to the plaintiff so they are also listed as John does, are being sued in their official and Individual Capacities.
6. Defendant William J. Bratton is the police Chief of police for the Los Angeles Police department and is responsible for the administration and every day operation of the Los Angeles police department including the conduct of the officers and the hiring and the firing and administration of policy and procedures of the Los Angeles Police department. He is sued in his official and Individual Capacities.
7. The City of Los Angeles is responsible for the hiring of the Police Chief William J. Bratton, and the reviewing all administrative procedures including the pay roll of the police officers under the police department care. Being sued in its Individual and official capacities.
8. All of the defendants have acted and continue to act, under the color of State law at all times relevant to this complaint.
9. The plaintiff Sexual sin de Un Abdul blue at the time and during the events described in this complaint was the owner of the following business
  - (a) La Cheap rent connection
  - (b) Eccentric five star professional maid service
  - (c) The California Times blue eagle shoppers bargain guide newspaper
  - (d) Blue abacus internet Café

All four businesses located at 5634 Hollywood Blvd in the City of Hollywood California and in the County of Los Angeles.

## **FACTS**

10. On March 19, of 2009 the plaintiff Sexual Sin De Un Abdul Blue, was at his place of business when two citizens enter the establishment and requested applications for employment.
11. Both citizens now know to the plaintiff as Alfred R. and Hayward D.
12. Hayward D. and Alfred R was given applications for employment by the plaintiff
13. Mr. Alfred R. and Hayward D. completed the applications for employment at the plaintiff establishment.
14. After Hayward D. and Alfred R completed their applications for employment then they left the establishment.
15. Hayward D. And Alfred R. then return back to the establishment proximally about 45 minutes later.
16. When Mr. Hayward D. and Alfred R. return back to the establishment they attempted to rob the plaintiff establishment.
17. The plaintiff was order to the back office by Alfred R. and Hayward where the plaintiff was then sexual assaulted.
18. After the sexual assault the plaintiff was order to turn over all cash inside of the establishment.
19. The plaintiff informed Alfred R. and Hayward D, that he does not keep cash in the office this early in the morning.

- 1       20. The plaintiff was then order by Alfred R. and Hayward D, to open his wallet  
which the plaintiff obliged.
- 2       21. Alfred R. grabbed the plaintiff wallet from out of his hand and then removed  
the plaintiff credit cards from the wallet.
- 3       22. The plaintiff was then order to turn over to turn over the employment  
applications that Alfred R. and Hayward D had completed earlier.
- 4       23. Both of their applications were sitting on the plaintiff's desk one has been  
torn by the plaintiff prior to the suspects returning back to the established.

5  
6       For the purpose of this complaint the plaintiff will call Hayward and Alfred  
suspects.

- 7       24. The plaintiff informed the suspects that the applications have the company  
personal information on them so that they could not be turn over.
- 8       25. Alfred R. notice the application sitting on the plaintiffs desk and grabbed  
them the plaintiff also grabbed them. They stugger for a few minutes with the  
application when the plaintiff was pushed against the wall by Hayward D, the  
other suspect putted a hammer to the plaintiff head the same hammer that was  
used in the sexual assault against the plaintiff in the back office.
- 9       26. When the plaintiff felled against the wall he landed next to his coreless  
business phone.
- 10      27. The plaintiff grabbed the phone and dialed 911
- 11      28. As the plaintiff begin to talk to the 911 dispatch operated suspect Alfred  
grabbed the phone from the plaintiff and pulled the phone from the wall  
socket
- 12      29. The plaintiff was told by the suspects that if he tried something like that  
again that they fuck him up and leave him for dead.
- 13      30. The suspects then order that the plaintiff give them \$500.00 each in cash.
- 14      31. The plaintiff once again told the suspects that he did not keep cash inside of  
the establishment at 9am in the morning.
- 15      32. One of the suspects then said that we do not need to keep cash in the  
establishment because you have credit cards and that we are going to go to the  
ATM machine and make a with draw.
- 16      33. The plaintiff then informs the suspects that he could not leave because he had  
appointments and it was time to open the business.
- 17      34. Suspect Hayward told the plaintiff too bad, and that they did not give a fuck  
about the plaintiff business or appointments.
- 18      35. The plaintiff was then order out of the door with the suspects following close  
by hind the plaintiff. One of the suspects grabbed the plaintiff by the left  
arm.
- 19      36. The plaintiff was warned not to try anything funny by the suspects.
- 20      37. The plaintiff and the suspects walked to the ATM machine located at the mobile  
gas station on Hollywood blvd. less then 2 blocks from the establishment.
- 21      38. Once at the ATM machine the plaintiff was order to stick his credit card  
inside of the ATM machine.
- 22      39. The plaintiff pushed his pin number into the ATM machine as order a receipt  
came out of the ATM machine saying insufficient funds.
- 23      40. One of the suspects grabbed the receipt from the machine and the plaintiff  
credit card from the ATM machine then proceeds to put the credit card back  
into the machine. He punched the plaintiff pin number into the ATM machine to  
re do the transaction.
- 24      41. The receipt cam back out as insufficient funds a second time. The suspects  
once again grabbed the receipt.
- 25      42. Both suspects were mad and said to the plaintiff what type of business man are  
you with no funds.
- 26      43. The plaintiff was order by the suspects out of the mobile gas station.

1       44. The plaintiff was told by one of the suspects that their demand of \$500.00 was  
2       now \$1,000 and that they were going to the bank to withdraw the cash.  
3       45. The suspects asked the plaintiff which bank does he bank with the plaintiff  
4       told them that he banked with two banks bank of American and Washington mutual  
5       banks.  
6       46. Plaintiff told the suspects that the bank was too far and that he had to open  
7       the door for his employees.  
8       47. Suspect Alfred told the plaintiff that he didn't give a fuck that they were  
9       going to the bank. Because they wanted cash and they wanted it now.  
10      48. Hayward said to the plaintiff to start walking and to remember that they will  
11      be right behind him.  
12      49. The plaintiff and the suspects arrived at Washington mutual bank at  
13      approximately 12:10  
14      50. Once inside of the bank the plaintiff was asked to sign in on the cliff board  
15      and to wait for the next representative.  
16      51. The suspects picked up the cliff board after the plaintiff had placed the board  
17      down back on the table to see the plaintiff has written on the board.  
18      52. Hayward asked the plaintiff why he didn't get in line for service.  
19      53. The plaintiff told Hanford that for business accounts you had to see a  
20      representative.  
21      54. When the plaintiff was called he walked to the desk as he was about to sit  
22      down at the desk he noticed that the two suspects were standing right behind  
23      him.  
24      55. The plaintiff explained to the two suspects that they could not be sitting the  
25      desk with him because this was a business account. The suspects refuse to  
26      leave. They stood there for about three minutes. The bank employee stood there  
27      looking at all three of us. I finally told them that if they did not move away  
28      and give them privacy that he would not make any type of withdrawal,  
29      56. The suspects finally went back to their chairs. The plaintiff used this  
30      opportunity to pass a note to the bank employee informing him what was going  
31      on.  
32      57. The bank employee whom the plaintiff now known to be Mr. Todd Schelling left  
33      the desk and went to call the police.  
34      58. The bank employee returns about 3-4 minutes later. While he was gone the two  
35      suspects walked up to the desk and told the plaintiff that he better not be  
36      trying to do anything funny.  
37      59. The two suspects left and went back to their chairs when Mr. Todd Schelling  
38      arrived.  
39      60. The plaintiff and Mr. Todd Schelling pretend to be conducting bank business.

DENIAL OF DUE PROCESS OF THE LAW AND EQUAL PROTECTION OF THE LAW

- 1       61. Defendants officer Craig, Officer Kirkman, Officer Marrion alone with other  
2       members of the Los Angeles Police department enter the bank with their guns  
3       drawn and forced the plaintiff and the suspects to the ground.
- 2       62. All of the customers were escorted out of the bank.
- 3       63. The plaintiff and the suspects was hand cuffed and taken outside of the bank  
4       where they were interview.
- 4       64. While at the scene, Sgt Kirkman recovered a black back pack outside of the  
5       bank which contained numerous items including a metal hammer with a wooden  
6       handle the weapon used in the assault against the plaintiff.
- 6       65. Hayward stated to one of the investigating officer at the scene that the  
7       recovered backpack was his backpack and that the reason that he left the  
8       backpack out side was so that the bank alarm would not go off.
- 7       66. The plaintiff alone with the suspects was transfer to the Los Angeles Police  
8       department to be interview.
- 8       67. Prior to the transfer the investigating officers learned that the plaintiff  
9       was on active parole.
- 9       68. Det. Vinton while at the police station during a search on the suspects  
10      recovered the torn employment applications taken from the plaintiff office  
10      from the suspects during the robbery.
- 10      69. Det. Vinton also recovers the ATM receipts from one of the suspects. All items  
11      was collected and booked into evidence at PAB property room.
- 11      70. While at the police station the plaintiff was interviewed by Vinton.
- 12      71. The suspects were interview by Det Bower and Det Vinton.
- 13      72. While the plaintiff was being interview by Det. Vinton, there was a knock at  
14      the door. When the door open on the other end of the door was Det. Went to the  
14      door and stepped out side to carry a conversation the Det. Returned 2-3  
15      minutes later and asked the plaintiff for his code/pass word to get into his  
15      computer at the office.
- 15      73. At some point the officers learned that the plaintiff was on active parole.
- 16      74. The plaintiff was booked into the jail for parole violation in the Hollywood  
16      police station.
- 17      75. While being booked the plaintiff was told by Det. Vinton that I did not tell  
18      the truth and the suspects told a difference story and that he was going to  
18      book me for oral sex on a minor. The plaintiff then told the Det. That he had  
19      nothing else to say with out an attorney present.
- 19      76. The plaintiff was taken to UCLA medical center and given a sexual assault  
19      examination which the investigating officers wanted to use against the  
20      plaintiff to support the arrest.
- 20      77. The plaintiff heard Det. Vinton and Det Bower talking in the hall way saying  
21      that the suspects did not have a record so that they was going to release them  
21      and put a charge on the parole since he had a record and was on active parole.

22      **NEGLECT AND CIVIL CONSPIRACY**

- 23      78. The plaintiff told the Det. To obtain the 911 tapes and video camera from the  
24      mobile gas station and ATM machine as well as finger prints from his ATM card  
24      and the Telephone from the office which they refuse to do.
- 25      79. The plaintiff was told by Det. Vinton that they did not believe his story. The  
26      detective said that they believed that the robbery took place but not the kid-  
26      napping and the sexual assault.
- 27      80. The plaintiff was told that they had already searched his business and found  
28      sedan in the bath room sink and on the floor in the office
81. The plaintiff watched in disbelief as the suspects walked out of the back door  
with their back pack as he sat on a bench with hand cuffs chain to the bench.

1       82. The plaintiff was booked for oral sex with a minor under California penal code  
2       section 288 (a) (b) (1). The plaintiff was place in the section of the jail  
for violate sex offenders

3       83. The plaintiff was listed on the Los Angeles County jail as a sex offender

4       84. The defendants went to elaborate extremes to cover up the fact that the  
5       plaintiff was the victim of a very violate crime in order to satisfy their  
6       twisted needs. The plaintiff was the defendants latest puzzle piece. The  
defendant's job as law enforcement officers is to discover the truth and use  
the truth to do justice. Which they did not do in the case at bar. Rogue cops  
should not be intolerable in this free society.

7       85. On or about April 27, of 2009 the plaintiff received a letter from his mother  
8       asked him why was he incarcerated for a sex crime. She indicated that she had  
9       received several phone calls from family members and friends of mine asked  
abut the sex crime on a minor.

10      **VIOLATION OF THE CONSITUTION TO THE UNITED STATES**

11      86. The plaintiff mother told him that the officers had searched the plaintiff  
business in order to search for evident to convict the plaintiff.

12      87. The plaintiff contends that he had a "legitimate of privacy" at his place of  
business. No search warrant was obtained and the search took place while the  
plaintiff was in custody at the Hollywood police station and that the arrest  
did not take place at his place of business. The arrest took place at at the  
bank three miles away from the plaintiff place of business.

13      88. As the direct result of the defendants conduct and actions the plaintiff name  
has been slander.

14      89. As the direct result of the defendant's horrendous actions and conduct the  
plaintiff business blue abacus internet cafe was forced to close.

15      90. As the direct result of the defendants unbelievable action and intentional  
planed actions the plaintiff business La Cheap Rent Connection and The  
California Blue Eagle Shoppers Bargain Guide newspaper and his business  
Eccentric exotic five star Professional Maid service was force out of business  
said actions was foreseeable.

16      91. As the result conduct of the defendants the plaintiff was evicted from his two  
residents.

17      92. As of today date the plaintiff has not been able to recover and has been  
deemed homeless and force to sleep on the danger streets of Los Angeles up on  
his release from prison.

18      93. As the direct result of the defendant's action the plaintiff is in  
unbelievable debt in business and personal debt.

19      94. The defendants have abused the power. Their conduct is outrageous as sworn  
officers of the law they violated both the federal and State laws.

20      95. The defendant's refusal to investigate the plaintiff claims and take the  
neccesary actins as require by law is a direct violation of the bill of rights  
due process clause and the federal constitution to the due right of the law  
clause and equal protection of the law.

21      96. Failure to investigate and to prosecute the suspects when the evidence is  
clear because the plaintiff parole status constitute deliberate indifference  
and contributed to and proximately caused the above described constitutional  
violations which was intentional and foreseeable.

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2 **DEFENDANTS CONSPIRE TO COMMIT FRAUD BY MINIMIZATION AND INTENTIONAL ACT OF**  
3 **MANUFACTURE AND FABRICATION OF THE EVIDENCE**

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97. On the 08<sup>th</sup> of April of 2009, the plaintiff attended a parole revocational proceeding for the charge of Oral copulation of a minor or non consenting adult in violation of California penal code section 288. Present at said hearing was Attorney Meighan Teresa for the plaintiff. Because of the seriousness of the charge the plaintiff was offer 10 months by the parole department said offer was rejected by the plaintiff and his attorney.

98. On April 20<sup>th</sup> of 2009 a parole revocational hearing was held at the Los Angeles county jail said hearing was recorded and all parties sworn under oath. Present at said hearing was parole hearing agent F. Perez, and parole agent Brandley Slavash as witness for the parole department. Also called as a witness was Officer Craig.

99. Witness Hayward and Alfred did not attend said hearing according to the record they could not be served a subpoena because the Los Angeles Police department did not obtain their address prior to releasing them.

100. Defendant Craig testified at said hearing that it was his personal opinion that the plaintiff concocted the story that he was robbed to the bank.

101. When Officer Craig was asked why he believed that the plaintiff concocted the story of being robbed to the bank the defendant officer Craig said that the bank was 2 miles from the plaintiff business.

102. The plaintiff contends by his complaint that this is no reason not to investigate the fact that the plaintiff was sexual assaulted and robbed as well as kid napped especially when there is solid evidence.

103. The defendant officer Craig did everything within his power at said hearing including manufacture and fabrication of the evidence to convict the plaintiff at said hearing.

104. At said hearing officer Craig as evidence a property receipt for items recover at the scene and from the suspects. The defendant testified that the items belonged to the plaintiff however the police reported said that the items was recover from the two suspects and that they admitted to the items as being theirs. Officer testified that the police reports in this case were wrong.

105. The failure of the defendants to hold the suspects responsible and to investigate this outrageous crime against the plaintiff denied the plaintiff the due right protection incorporated in the constitution which he is entitle to and constituted due process of the law in direct violation of the constitution to the United States constitution.

106. The search of the plaintiff business with out a search warrant signed by a judge and removing the plaintiff keys from his personal property in order to carry out said search violates the plaintiff right to unlawful searches in violation of both the State and Federal constitution.

107. The Los Angeles police department can not continue to be allowing to manipulation citizens because of their parole status while living in a free society.

108. This conduct by the defendants is at best irresponsible and insane. The plaintiff was a part for the defendants "High states poker game" the defendants is playing.

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2       RELIEF REQUESTED  
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4       WHEREFORE, plaintiff requests that the court grant the following relief;

5       A. Issue a declaratory judgment stating that;

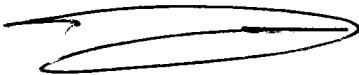
6  
7       1. The abuse of the plaintiff by the defendants violated the plaintiff rights  
8       under the federal and State law  
9       2. The defendant's failure to investigate and prosecute the persons that is  
9       responsible for the crimes against the plaintiff violated the plaintiff right  
10      to equal protection of the law.  
10      3. Defendant Craig actions at the plaintiff parole hearing and his action in  
10      sustaining said action violated the plaintiff rights under the due right  
11      clause.  
11      4. Defendant William J. Bratton actions in failing to protect the plaintiff  
12      rights to equal protection of the law violated the plaintiff rights and  
12      continues to violate the plaintiff rights under the eight amendments to the  
13      United States constitution.  
13      5. The illegal search of the plaintiff business without a warrant to search said  
14      business violated and continue to violate the plaintiff right to equal  
14      protection under the fourth amendment to the united state of the  
15      constitution.

16      B. Issue an injunction ordering Defendants City of Los Angeles, and Los Angeles  
17      police department, William J. Bratton, Officer Craig, Kirkman, Kohr, Vinton,  
17      Mendoza, Brower, and John doe.

18      1. Expunge the disciplinary convictions in this complaint from the institutional  
18      record.  
19      2. Develop a written policy on parolees and public safety which should include a  
20      ban on parole arrest with lack of evidence and or charges without the needed  
20      evidence to sub stand a charge against the parolee with the district attorney  
21      office and to investigate all claims or complaints of Angelinos including  
21      those that are on parole.

22      C. AWARD COMPENSATORY DAMAGES IN THE FOLLOWING AMOUNTS

23  
24      1. \$100,000.00 JOINTLY AND SEVERALLY AGAINST DEFENDANTS Craig, Kirkman, Vinton,  
25      Kohr, Mendoza, Brower, John Doe, for the punishment and emotional and physical  
25      injury resulting from their denied of due process in connection with the  
26      plaintiff parole revocation hearing disciplinary proceeding.  
26      2. \$16,000.00 jointly and severally against the defendants for emotional and  
27      physical injury resulting from failure to provide adequate protection to the  
27      plaintiff and for violating the plaintiff constitutional rights which the  
28      plaintiff is entitled.  
28      3. \$15, 000, 00 jointly and severally against defendants for economic damages  
28      incorporated with the loss of future earnings.  
4. \$1, 900, 00 for non-economic damages.

1           D. Award punitive damages against the defendants  
2           E. Grant such other relief as it may appear that the plaintiff is entitled.  
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8           Respectfully Submitted,  
9             
10          Mr. Sexual Sin De Un Abdul Blue  
11          823 North Hudson Avenue, apt 01  
12          Hollywood California 90038  
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